

THE MARKS LAW FIRM, P.C.

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December 6, 2023

**Filed via ECF**

Hon. J. Paul Oetken  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 706  
New York, NY 10007

RE: **Salustiano Sanabria v. Rawsome Treats LLC, et al.**  
Case No. 1:23-cv-07134-JPO

Dear Judge Oetken,

The parties jointly and respectfully request an extension of the deadline to complete Depositions from December 14, 2023 (next week), to February 5, 2024 (about 30 days after the mediation conference), as set forth in Section 6(d) of Your Honor's October 3, 2023 Case Management Plan [Dkt. 13].

The reason for this request, is that, the parties have been engaged in substantive settlement discussions and are scheduled for a Mediation Conference on January 4, 2024 [Dkt. 14]. This extension would allow the parties to continue discussing resolution prior to conducting the Depositions of the parties and the exchange of certain documents and with the assistance of the SDNY Mediation Program, which may obviate the need to expend unnecessary resources towards discovery and this Court's time. This is the first request of its kind and is being made on consent of all parties.

We thank you the Court for its time and consideration.

Respectfully Submitted,

The Marks Law Firm, P.C.

By:   
Bradly G. Marks